

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** ) **Bankruptcy No. 18-21729-CMB**  
 )  
**Kerry Patrick Seifen and** ) **Chapter 13**  
**Luann Ellen Seifen** )  
 ) **Debtors,** )  
**Shellpoint Mortgage Servicing** )  
 ) **Movant,** ) **Related Claim No. 10-1**  
**vs.** )  
**Kerry Patrick Seifen and** )  
**Luann Ellen Seifen** )  
**Ronda J. Winnecour, Chapter 13 Trustee,** )  
 ) **Respondents.** ) **Document No.**

**DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT**

**AND NOW**, comes the Debtors, Kerry Patrick Seifen and Luann Ellen Seifen, by and through their attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. The Debtors, Kerry Patrick Seifen and Luann Ellen Seifen, commenced this case on May 1, 2018, by filing a Chapter 13 petition.

1. The Movant filed a Notice of Mortgage Payment Change on May 9, 2019.

2. The Debtors' are currently in an interim loan modification that was approved by this court.

3. There is no need to amend the confirmed plan. The Trial Modification Order is sufficient to pay the interim loan modification payment.

**Respectfully submitted,**

**DATED:** May 30, 2019

**BY:** /s/ David Z. Valencik  
**David Z. Valencik, Esquire, PA I.D. #308361**  
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**BY:** /s/ Donald R. Calaiaro  
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Ronda J. Winnecour, Chapter 13 Trustee, )  
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**CERTIFICATE OF SERVICE OF DECLARATION THAT THE  
EXISTING CHAPTER 13 PLAN IS SUFFICIENT**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on May 29, 2019.

**Service by First Class Mail:**

Kerry & Luann Seifen 124 S. Jefferson Ave Canonsburg, PA 15317

**Service by NEF:**

Ketan Sawarkar, Claims Processor AIS Portfolio Services, LP PO Box 201347 Arlington, TX 76006

Office of the U.S. Trustee, 1001 Liberty Avenue, Liberty Center, Suite 970, Pittsburgh, PA 15222

Ronda J. Winnecour, Chapter 13 Trustee receives service electronically through the CM/ECF System at [cmecf@chapter13trusteedpa.com](mailto:cmecf@chapter13trusteedpa.com)

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First Class Mail or Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: 5/30/19

/s/ David Z. Valencik  
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